

EXHIBIT D

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

NATIONAL CREDIT UNION
ADMINISTRATION BOARD, as Liquidating
Agent of Southwest Corporate Federal Credit
Union and Members United Corporate Federal
Credit Union,

Plaintiff,

v.

MORGAN STANLEY & CO., INC. and
MORGAN STANLEY CAPITAL I INC.,

Defendants.

And other NCUA Actions.

Case No. 13-cv-6705 (DLC)
Case No. 13-cv-6719 (DLC)
Case No. 13-cv-6721 (DLC)
Case No. 13-cv-6726 (DLC)
Case No. 13-cv-6727 (DLC)
Case No. 13-cv-6731 (DLC)
Case No. 13-cv-6736 (DLC)

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF KANSAS**

NATIONAL CREDIT UNION
ADMINISTRATION BOARD, as Liquidating
Agent of U.S. Central Federal Credit Union,

Plaintiff,

v.

RBS SECURITIES, INC., f/k/a/ GREENWICH
CAPITAL MARKETS, INC., et al.,

Defendants.

And other NCUA Actions.

Case No. 11-cv-2340 & 2649 (JWL)
Case No. 12-cv-2591 (JWL)
Case No. 12-cv-2648 (JWL)
Case No. 13-cv-2418 (JWL)

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

NATIONAL CREDIT UNION
ADMINISTRATION BOARD, as Liquidating
Agent of Western Corporate Federal Credit
Union,

Plaintiff,

v.

RBS SECURITIES, INC., f/k/a/ GREENWICH
CAPITAL MARKETS, INC., et al.,

Defendants.

And other NCUA Actions.

Case No. 11-cv-5887 (GW)

Case No. 11-cv-6521 (GW)

DEFENDANTS' FIRST SET OF JOINT INTERROGATORIES

any Certificate or Securitization, or any loan securing any Certificate or Securitization.. With respect to all third parties acting on WesCorp's behalf, including outside counsel, outside advisors, investment managers, and vendors, the response to this Interrogatory should set forth the date(s) they were retained or otherwise became involved in the subjects set forth in this interrogatory, beginning on the earliest of the date of retention or date(s) of other involvement.

5. Identify all individuals who were responsible for WesCorp's investment strategy and investment management concerning RMBS from January 1, 2004 to the present, and specify all such individuals who have knowledge and/or possess documents concerning WesCorp's investment strategies relating to RMBS.

6. Identify for each WesCorp Certificate the tranche from which that Certificate was purchased by WesCorp, the price paid, the date of WesCorp's purchase, and the entity from which the purchase was made, including whether such Certificate was purchased from the initial offering or the secondary market, the amount of any subsequent repayments of principal, missed or late payments, if any, the unpaid principal balance on each Certificate, the cumulative income received on each such Certificate, whether that Certificate was sold, the price of sale, the date of sale, the entity from which the sale was made, whether such sale was made through the National Credit Union Administration Board Guaranteed Notes Program, and whether any interest in the Certificate was retained or repurchased by NCUA or the Credit Unions (and if so, describe the interest retained or repurchased).

III. Interrogatories Directed to U.S. Central

1. Identify all persons currently or formerly employed by U.S. Central, or acting for or on U.S. Central's behalf, including outside advisors or investment managers, who received, read, reviewed, or consulted the Offering Documents relating to the U.S. Central Certificates, including, but not limited to, registration statements, prospectuses, or prospectus supplements,

any Certificate or Securitization, or any loan securing any Certificate or Securitization.. With respect to all third parties acting on U.S. Central's behalf, including outside counsel, outside advisors, investment managers, and vendors, the response to this Interrogatory should set forth the date(s) they were retained or otherwise became involved in the subjects set forth in this interrogatory, beginning on the earliest of the date of retention or date(s) of other involvement.

5. Identify all individuals who were responsible for U.S. Central's investment strategy and investment management concerning RMBS from January 1, 2004 to the present, and specify all such individuals who have knowledge and/or possess documents concerning U.S. Central's investment strategies relating to RMBS.

6. Identify for each U.S. Central Certificate the tranche from which that Certificate was purchased by U.S. Central, the price paid, the date of U.S. Central's purchase, and the entity from which the purchase was made, including whether such Certificate was purchased from the initial offering or the secondary market, the amount of any subsequent repayments of principal, missed or late payments, if any, the unpaid principal balance on each Certificate, the cumulative income received on each such Certificate, whether that Certificate was sold, the price of sale, the date of sale, the entity from which the sale was made, whether such sale was made through the National Credit Union Administration Board Guaranteed Notes Program, and whether any interest in the Certificate was retained or repurchased by NCUA or the Credit Unions (and if so, describe the interest retained or repurchased).

IV. Interrogatories Directed to Southwest

1. Identify all persons currently or formerly employed by Southwest, or acting for or on Southwest's behalf, including outside advisors or investment managers, who received, read, reviewed, or consulted the Offering Documents relating to the Southwest Certificates, including,

the Complaints; or (iii) the investigation, evaluation or assertion of any claims with respect to any Certificate or Securitization, or any loan securing any Certificate or Securitization.. With respect to all third parties acting on Southwest's behalf, including outside counsel, outside advisors, investment managers, and vendors, the response to this Interrogatory should set forth the date(s) they were retained or otherwise became involved in the subjects set forth in this interrogatory, beginning on the earliest of the date of retention or date(s) of other involvement.

5. Identify all individuals who were responsible for Southwest's investment strategy and investment management concerning RMBS from January 1, 2004 to the present, and specify all such individuals who have knowledge and/or possess documents concerning Southwest's investment strategies relating to RMBS.

6. Identify for each Southwest Certificate the tranche from which that Certificate was purchased by Southwest, the price paid, the date of Southwest's purchase, and the entity from which the purchase was made, including whether such Certificate was purchased from the initial offering or the secondary market, the amount of any subsequent repayments of principal, missed or late payments, if any, the unpaid principal balance on each Certificate, the cumulative income received on each such Certificate, whether that Certificate was sold, the price of sale, the date of sale, the entity from which the sale was made, whether such sale was made through the National Credit Union Administration Board Guaranteed Notes Program, and whether any interest in the Certificate was retained or repurchased by Southwest (and if so, describe the interest retained or repurchased).

7. Identify each Residential Mortgage-Backed Security that Southwest purchased or sold between January 1, 2003 and the present, including but not limited to the CUSIP number for

5. Identify all individuals who were responsible for Members United's investment strategy and investment management concerning RMBS from January 1, 2004 to the present, and specify all such individuals who have knowledge and/or possess documents concerning Members United's investment strategies relating to RMBS.

6. Identify for each Members United Certificate the tranche from which that Certificate was purchased by Members United, the price paid, the date of Members United's purchase, and the entity from which the purchase was made, including whether such Certificate was purchased from the initial offering or the secondary market, the amount of any subsequent repayments of principal, missed or late payments, if any, the unpaid principal balance on each Certificate, the cumulative income received on each such Certificate, whether that Certificate was sold, the price of sale, the date of sale, the entity from which the sale was made, whether such sale was made through the National Credit Union Administration Board Guaranteed Notes Program, and whether any interest in the Certificate was retained or repurchased by Members United (and if so, describe the interest retained or repurchased).

7. Identify each Residential Mortgage-Backed Security that Members United purchased or sold between January 1, 2003 and the present, including but not limited to the CUSIP number for the Residential Mortgage-Backed Security, and the amount of each purchase or sale, and whether the transaction was a purchase or sale.

8. Identify all of Members United's employees, agents, directors, officers, or managers who participated in any review, analysis, approval, consideration, evaluation, investigation, or due diligence undertaken or obtained by Members United in connection with Members United's purchase of the Members United Certificates (including but not limited to any analysis or review of loan data or loan files), or who otherwise participated in Members United's